

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

GETTY IMAGES, INC., a Delaware  
Corporation,

Plaintiff,

vs.

ROXANNE MOTAMEDI, an individual,

Defendant.

Case No. 2:16-cv-1892

DECLARATION OF JEFFREY A.  
JAMES IN SUPPORT OF PLAINTIFF'S  
MOTION FOR TEMPORARY  
RESTRAINING ORDER

1. My name is Jeffrey A. James. I am the attorney representing plaintiff Getty Images, Inc. ("GETTY IMAGES"). I have personal knowledge of the following facts.

2. Attached hereto as Exhibit 1 is a copy of Plaintiff's First Set of Expedited Discovery Requests to Defendant.

3. GETTY IMAGES is requesting that the Court issue a Letter of Request for International Judicial Assistance Pursuant to The Hague Convention of 18 March 1970 on the Taking of Evidence Abroad in Civil and Commercial matters ("Letter of Request"). The Letter of Request is a precursor to applying to the English court to issue an order compelling the non-party witnesses, *e.g.*, Evans-Lombe and others at Silverhub, to attend a deposition in England and produce documents in advance of that deposition. This discovery is needed to uncover the extent of the conspiracy and further support a preliminary injunction. If the Court grants this

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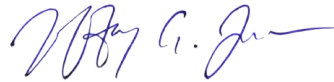
DECLARATION OF JEFFREY A. JAMES - 1

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1 request, GETTY IMAGES can secure an appropriate form from its UK counsel to provide to the  
2 Court.

3  
4 I declare under the penalty of perjury under the laws of the United States that the  
5 foregoing is true and correct.

6  
7 DATED this 11<sup>th</sup> day of December, 2016, at Plain, Washington.

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10 Jeffrey A. James, WSBA #18277